

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In Re:)	
)	Bankruptcy Case No. 20-30376
KIMBERLY DIONNE MOORE,)	
)	Chapter 13
<u>Debtor.</u>)	
)	
KIMBERLY DIONNE MOORE,)	
)	
<u>Plaintiff,</u>)	
)	Adversary Proceeding No. 23-03016
v.)	
)	
WILLIAM W. GILLESPIE, JR. and)	
JIMMIE C. GILLESPIE,)	
<u>Defendant.</u>)	

MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT TO STRIP LIEN

NOW COMES William W. Gillespie, Jr. and Jimmie C. Gillespie (collectively, "Defendants"), by and through the undersigned counsel and respectfully moves the Court requesting an Order extending the deadline for Defendants to file their answer or response to the Complaint to Strip Lien. In support of this motion, Defendant respectfully shows unto the Court as follows:

1. This adversary proceeding was filed on June 9, 2023.
2. Defendant was served with a copy of the Complaint and Summons on June 13, 2023. The deadline for Defendants to file their responses is July 13, 2023.
3. Due to the nature of this proceeding, Defendants believe that good cause exists for the Court to grant an extension of time for Defendants to file their answer or responsive pleadings.

WHEREFORE, Defendants respectfully pray that the Court enter an Order granting an extension of time for Defendants to answer or otherwise respond to the Complaint to Strip Lien and the deadline be extended through and including August 12, 2023.

This the 11th day of July, 2023.

/s/ Stacy C. Cordes
Stacy C. Cordes
Cordes Law, PLLC
1800 East Boulevard
Charlotte, North Carolina 28207
Telephone: 704-332-3565
E-mail: stacy@cordes-law.com

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of July, 2023, I electronically filed the Motion for an Extension of Time to Respond to Complaint to Strip Lien with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following parties:

U.S. Bankruptcy Administrator

Rashad Blossom
Blossom Law, PLLC

Jenny P. Holman
Office of the Chapter 13 Trustee

This the 11th day of July, 2023.

/s/ Stacy C. Cordes _____
Stacy C. Cordes
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Charlotte, North Carolina 28207
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